

Subcategories and Emission Limits

[§§63.4681 and 63.4690]

**kilograms of HAP/liter of solids
(pounds of HAP/gallon of solids)***

If you apply coatings to...	And you are an existing source, the organic HAP emission limit is...	And you are a new or reconstructed source, the organic HAP emission limit is...
Doors and Windows	0.17 (1.45)	0.06 (0.48)
Flooring	0.09 (0.78)	0.00 (0.00)
Interior Wall Paneling and Tileboard	0.18 (1.53)	0.00 (0.04)
Other Interior Paneling	0.00 (0.01)	0.00 (0.00)
Exterior Siding, Doorskins, and Miscellaneous	0.01 (0.06)	0.00 (0.00)

*Kg HAP/L solids rate will be used to determine compliance.

Compliance Options

[§63.4691]

You may comply with your subcategory emission limit as identified above by doing any of the following:

1) Compliant Material Option –

Each coating you use must meet the applicable emission limit and each thinner and cleaning material you use must contain no organic HAP.

2) Emission Rate Without Add-On Controls –

The combination of coatings, thinners, and cleaning materials you use must meet the applicable organic HAP emission limit.

3) Emission Rate With Add-On Controls –

The combination of coatings, thinners, and cleaning materials you use (including the emission capture and control device efficiency) must meet the applicable organic HAP emission limit.

Compliance Calculations

[§§63.4741, 63.4751, and 63.4761]

Using the collected data for coatings, thinners, and cleaning materials, a rolling 12-month organic HAP emission rate is calculated on a monthly basis by using the data collected from the current month and combining with the previous 11 months' data.

For More Information

Copies of the rule and other material are located at EPA's Wood Building Products Website:

www.epa.gov/ttn/atw/coat/wbldg/wbldgpgg.html

You can also contact your regional EPA air toxics office at the following numbers:

Address	States	Website/ Phone Number
Region 1 1 Congress Street Suite 1100 Boston, MA 02114-2023	CT, MA, ME, NH, RI, VT	www.epa.gov/region1 (888) 372-7341
Region 2 290 Broadway New York, NY 10007-1866	NJ, NY, PR	www.epa.gov/region2 (212) 637-3000
Region 3 1650 Arch Street Philadelphia, PA 19103-2029	DE, MD, PA, VA, WB, DC	www.epa.gov/region3 (800) 438-2474
Region 4 Atlanta Federal Center 61 Forsyth Street, SW Atlanta, GA 30303-3104	FL, NC, SC, KY, TN, GA, AL, MS	www.epa.gov/region4 (800) 241-1754
Region 5 77 W. Jackson Blvd Chicago, IL 60604	IL, IN, MI, WI, MN, OH	www.epa.gov/region5 (800) 621-8431
Region 6 1445 Ross Avenue Suite 1200 Dallas, TX 75202	AR, LA, NM, OK, TX	www.epa.gov/region6 (800) 887-6063
Region 7 901 N. 5 th Street Kansas City, KS 66101	IA, KS, MO, NE	www.epa.gov/region7 (800) 223-0425
Region 8 999-18th St. Suite 300 Denver, CO 80202-2466	CO, MT, ND, SD, UT, WY	www.epa.gov/region8 (800) 227-8917
Region 9 75 Hawthorne St., San Francisco, CA 94105	CA, AZ, HI, NV	www.epa.gov/region9 (415) 947-8000
Region 10 1200 6 th Avenue Seattle, WA 98101	AK, ID, WA, OR	www.epa.gov/region10 (800) 424-4372

Implementation tools (overviews, Q&As, etc.) will be developed for this rule. You can keep informed on the implementation activities planned by EPA's Office of Air Quality Planning and Standards (OAQPS) by periodically checking the rule's Implementation Plan. For Wood Building Products, that address is

www.epa.gov/ttn/uatw/wbldg/wbldgplan.html



United States
Environmental Protection
Agency

July 2002

www.epa.gov/ttn/atw/wbldg/wbldgpgg.html

Office of Air Quality Planning & Standards (E-143-02)

DRAFT V2 WOOD BUILDING PRODUCTS SURFACE COATING OPERATIONS NESHAP (SUBPART QQQQ) AN OVERVIEW OF THE PROPOSED RULE

[Photo Pending]

New EPA air emission standards for Wood Building Products Surface Coating Operations were proposed on June 21, 2002.

Who is covered by the rule?

[§63.4681]

You are affected if:

- ❖ you own or operate an affected source that uses at least 4,170 liters (1,100 gallons) of coating per year in the surface coating of wood building products AND
- ❖ your facility is a major source, is located at a major source, or is part of a major source of hazardous air pollutants (HAP)

An Affected Source is ...

Any new or existing facility that has surface coating operations involving wood building products

A Wood Building Product is...

Any finished or laminated wood product that contains more than 50% (by weight) wood or wood fibers and is used in the construction (interior or exterior) of a residential, commercial, or institutional building

Who is not covered by this rule?

[§63.4681]

The following sources are not covered under Subpart QQQQ:

- ❖ Premanufactured home manufacturing facilities
- ❖ Plywood and composite wood products manufacturing operations (covered by Subpart DDDD)
- ❖ Wood furniture manufacturing operations (covered under Subpart JJ)
- ❖ Wood treatment that use a retort or other pressure vessel

What standards must I follow?

[§63.4691]

If you **do not** use capture and control devices, Subpart QQQQ requires:

- ❖ Emission Limits
- ❖ Recordkeeping, and Reporting

If you use capture and control devices, Subpart QQQQ requires:

- ❖ Emission Limits
- ❖ Operating Limits
- ❖ Work Practice Standards
- ❖ Monitoring, Recordkeeping, and Reporting

Operating Limits and Monitoring Requirements

[§63.4692]

The operating limits are the site-specific parameter limits you determine for your capture and control devices during the performance test. Your operating limits must be monitored by a continuous parameter monitoring system (CPMS).

Work Practice Standards

[§63.4693]

If you use capture and control devices, you must develop and operate a work practice plan since this option allows you to use coatings, thinners and solvents that do not meet the organic HAP content limit. The plan should include actions to:

- ❖ Cover mixing and storage vessels containing HAP except when adding or removing contents
- ❖ Use closed containers to collect and store HAP-containing waste
- ❖ Minimize emissions through careful handling and transfer of HAP-containing coatings, thinners, cleaning materials, and wastes

Compliance Dates

[§63.4683]

If your initial startup is ...	Then you're *	And must comply by ...
On or before June 21, 2002	An existing source	Within three years of the effective date of the rule**
After June 21, 2002	A new source	By the effective date of the rule or the initial startup of your affected source, whichever is later

* When determining if a source is new or existing, the General Provisions (40 CFR 63, Subpart A) requires us to use the proposal date of the rule as the cutoff date. For subpart QQQQ, the rule proposal date was June 21, 2002.

**The effective date is the date the promulgated rule (final rule) is published in the Federal Register

Noncompliance with applicable regulations after the compliance date may result in fines and penalties of up to \$25,000 per day per violation.

Notification, Recordkeeping, and Reporting Requirements

Initial Notification: [§63.4710]

The initial notification states that your facility is subject to the Wood Building Products standards. You must submit this within 120 days after the effective date or 120 days after the startup date, whichever is later.

Notification of Intent to Conduct a Performance Test: [§63.7(b)]

If your facility is required to conduct performance tests (e.g., those with add-on control equipment), you must submit a notification of intent to conduct a performance test 60 days prior to the test.

Performance Test Report: [§63.4720]

If your facility is required to conduct performance tests (e.g., those with add-on control equipment), you must submit a performance test report within 60 days after the performance test. The performance test is required no later than 180 days after the applicable compliance date for new or reconstructed sources, and no later than the compliance date for existing affected sources.

Notification of Compliance Status: [§63.4710]

You must submit a Notification of Compliance Status (NOCS) to document your initial compliance. The NOCS is due within 30 days after the end of your initial compliance demonstration (e.g., first year after the compliance date).

Startup, Shutdown, Malfunction Reports:

[§63.4720]

In addition, a startup, shutdown, and malfunction report must be submitted immediately if there were a startup, shutdown, or malfunction of the control device during the reporting period that is not consistent with the startup, shutdown, and malfunction plan.

Semiannual Compliance Reports: [§63.4720]

After the initial compliance period each affected source must submit semiannual compliance reports.

Records: [§63.4730]

Your facility is required to keep records of reported information and all other information necessary to document compliance with the proposed rule for 5 years. Design and operation records for the control and monitoring equipment must be kept for the life of the equipment. Depending on the compliance option that you choose, there may be additional requirements, as described in the proposed rule.